## **Baker & Hostetler LLP**

45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Dean D. Hunt

Email: dhunt@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

MATHEW AND EVELYN BROMS INVESTMENT PARTNERSHIP; MATHEW BROMS REVOCABLE

Adv. Pro. No. 10-04985 (SMB)

TRUST, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; MATHEW BROMS MARITAL TRUST A U/A DATED 1/10/74, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; MATHEW BROMS CREDIT TRUST U/A DATED 1/10/74, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; EVELYN BROMS REVOCABLE TRUST U/A DATED 1/10/74, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; RICHARD BROMS, in his capacity as Trustee for the Mathew Broms Revocable Trust, Mathew Broms Marital Trust A u/a dated 1/10/74, Mathew Broms Credit Trust u/a dated 1/10/74, and Evelyn Broms Revocable Trust u/a dated 1/10/74; IRREVOCABLE TRUST FOR THE BENEFIT OF ALISON SARAH BROMS DTD 11/7/1984, in its capacity as a Partner in the Mathew and Evelyn Broms Investment Partnership; and THOMAS MOSCOE, in his capacity as Trustee for the Irrevocable Trust for the Benefit of Alison Sarah Broms dtd 11/17/1984,

Defendants.

## FOURTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures were due: April 30, 2014
- 2. Fact Discovery shall be completed by: December 11, 2015
- 3. The Disclosure of Case-in-Chief Experts shall be due: March 8, 2016
- 4. The Disclosure of Rebuttal Experts shall be due: April 8, 2016
- 5. The Deadline for Completion of Expert Discovery shall be: July 8, 2016

- 6. The Deadline for Mediation Referral shall be: September 9, 2016
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: September 23, 2016
- 8. The Deadline for Conclusion of Mediation shall be: January 20, 2017

August 14, 2015

Of Counsel:

#### **BAKER & HOSTETLER LLP**

811 Main Street, Suite 1100 Houston, Texas 77002-5018 Telephone: 713.751.1600 Facsimile: 713.751.1717

Dean D. Hunt

Email: dhunt@bakerlaw.com

By: /s/ Nicholas Cremona

## **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza New York, New York 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff